

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

Andrew B. Bloomer, P.C.  
To Call Writer Directly:  
(312) 862-2482  
andrew.bloomer@kirkland.com

300 North LaSalle  
Chicago, Illinois 60654  
  
(312) 862-2000  
  
www.kirkland.com

Facsimile:  
(312) 862-2200

April 7, 2016

The Honorable Jesse M. Furman  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:    *In re: General Motors LLC Ignition Switch Litigation*, 14-MD-2543  
      *Yingling v. General Motors LLC*, 14-CV-5336**

Dear Judge Furman:

Counsel for General Motors LLC (“New GM” or “GM LLC”) and counsel for plaintiff Nadia Yingling write to inform the Court that the parties have entered into a confidential settlement term sheet designed to resolve all of plaintiff’s claims. Under the terms of the confidential term sheet, the parties will work to finalize and execute a confidential settlement agreement and have a court of competent jurisdiction enter an order approving the settlement and allocation of the confidential settlement amount to plaintiff and the minor beneficiaries of James Yingling’s estate. In light of the parties’ confidential settlement term sheet, the parties respectfully request that the Court remove *Yingling* from the trial docket and suspend any remaining pretrial deadlines. New GM will meet and confer with Lead Counsel regarding a proposed schedule for the remaining bellwether trials, which the parties will be prepared to discuss with the Court at the April 20 Status Conference.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

*Counsel for Defendant General Motors LLC*

cc:     MDL Counsel of Record